

*(Stipulating parties listed on signature page)*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION,

No. 07-cv-5944-SC  
MDL No. 1917

This Document Relates to:

*Electrograph Systems, Inc. et al. v.  
Technicolor SA, et al., No. 13-cv-05724;*

**STIPULATION AND [PROPOSED]  
ORDER EXTENDING THE DEADLINE  
TO FILE MOTION TO COMPEL  
DIRECT ACTION PLAINTIFFS TO  
RESPOND TO CERTAIN OF THE  
THOMSON DEFENDANTS'  
DISCOVERY REQUESTS**

*Alfred H. Siegel, as Trustee of the Circuit City Stores, Inc. Liquidating Trust v. Technicolor SA, et al., No. 13-cv-05261;*

*Best Buy Co., Inc., et al. v. Technicolor SA, et al., No. 13-cv-05264;*

Judge: Hon. Samuel Conti

*Interbond Corporation of America v.  
Technicolor SA, et al., No. 13-cv-05727;*

*Office Depot, Inc. v. Technicolor SA, et al.,*  
No. 13-cv-05726:

*Costco Wholesale Corporation v.  
Technicolor SA, et al.* No. 13-cv-05723-

P.C. Richard & Son Long Island

*F.C. Richard & Son Long Island  
Companions to the Trade in Long Island*

P C Richard & Son Long Island

*F.C. Richard & Son Long Island Corporation, et al. v. Technicolor SA, et al., No. 31:cv-05725;*

*Schultze Agency Services, LLC, o/b/o  
Tweeter Opco, LLC, et al. v. Technicolor SA,  
Ltd., et al., No. 13-cv-05668;*

*Sears, Roebuck and Co. and Kmart Corp. v. Technicolor SA, No. 3:13-cv-05262;*

*Target Corp. v. Technicolor SA, et al., No. 13-cv-05686:*

*Tech Data Corp., et al. v. Hitachi, Ltd., et al., No. 13-cv-00157;*

*Sharp Electronics Corp., et al. v. Hitachi, Ltd., et. al., No. 13-cv-01173.*

Direct Action Plaintiffs Electrograph Systems, Inc.; Electrograph Technologies, Corp.; Alfred H. Siegel (as trustee of the Circuit City Stores, Inc. Liquidating Trust); Best Buy Co., Inc.; Best Buy Purchasing LLC; Best Buy Enterprise Services, Inc.; Best Buy Stores, L.P.; BestBuy.com, L.L.C.; Magnolia Hi-Fi, Inc.; Interbond Corporation of America; Office Depot, Inc.; Costco Wholesale Corporation; P.C. Richard & Son Long Island Corporation; ABC Appliance, Inc.; MARTA Cooperative of America, Inc.; Schultze Agency Services, LLC, (on behalf of Tweeter Opco, LLC, and Tweeter Newco, LLC); Sears Roebuck and Co. and Kmart Corp.; and Target Corp.; Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of America, Inc., (collectively, "Sharp"); Tech Data Corporation and Tech Data Product Management, Inc.; (all collectively the "DAPs") on the one hand, and Thomson S.A. (n.k.a. Technicolor S.A.) and Thomson Consumer Electronics, Inc. (n.k.a. Technicolor USA, Inc.) (collectively the "Thomson Defendants") on the other (together, the "Parties") have conferred by and through their counsel and, subject to the Court's approval, HEREBY STIPULATE AS FOLLOWS:

WHEREAS, on March 21, 2014, the Court entered a scheduling order setting the close of fact discovery for September 5, 2014 (Dkt. No. 2459);

WHEREAS, the deadline to file any motion to compel after the discovery cut-off is September 12, 2014 (L.R. 37-3);

WHEREAS, on August 1, 2014, the Thomson Defendants served discovery requests on all DAPs, including Thomson SA’s Second Set of Requests for Production, seeking, *inter alia*, documents reflecting both formal and informal communications between the DAPs and others regarding their intention to exclude themselves from the Direct Purchaser Plaintiff Class in this litigation (the “Opt-Out Discovery Request”);

1           WHEREAS, on or around September 5, 2014, all DAPs served their responses to the Opt-  
2 Out Discovery Request, which responses included objections on various grounds;

3           WHEREAS, on September 9, 2014, the Thomson Defendants sent a meet and confer letter  
4 to the DAPs regarding issues with their responses and the Parties have since met and conferred in  
5 a conference call and in subsequent correspondence with a *bona fide* intent to continue doing so;

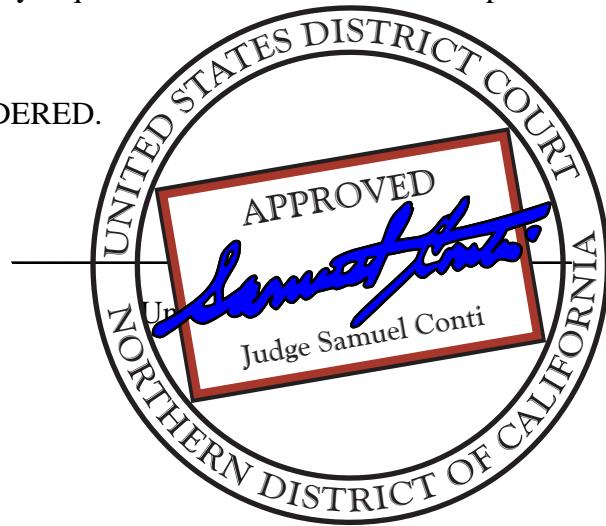
6           WHEREAS, the Thomson Defendants and the DAPs agree to extend the deadline for the  
7 Thomson Defendants to file a motion to compel relating to issues specific to the DAPs' responses  
8 and objections to the Opt-Out Discovery Request to September 19, 2014;

9           **NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED** between the  
10 undersigned counsel that the Thomson Defendants may file a motion to compel on issues specific  
11 to the Opt-Out Discovery Request on or before September 19, 2014.

12           The undersigned parties jointly and respectfully request that the Court enter this stipulation as  
13 an order.

14 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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16 Dated: October 2, 2014



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1 Dated: September 12, 2014

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Pursuant to Local Rule 5-1(i), the filer attests that the concurrence in the filing of this document has been obtained from each of the above signatories.